

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MYRIAM DURAND,
*individually and on behalf of others similarly
situated,*

Plaintiff,

-against

Civil Action:

Case CV- 20-4771

**CROWN HEIGHTS CENTER FOR
NURSING AND REHABILITATION,
and
JOEL LANDAU**

Defendants.

Plaintiff Myriam Durand (“Plaintiff Durand” or “Ms. Durand”), by and through her attorney T.A. Blackburn PLLC, upon her knowledge and belief, and as against Crown Heights Center for Nursing and Rehabilitation and Joel Landau asserts as follows:

1. Ms. Durand brings this action to remedy several egregious unlawful violations of New York City Human Rights Law (NYCHRL), New York State Human Labor Law (NYSHRL), New York State Labor Law (NYLL), and the Fair Labor Standards Act (FLSA).

PARTIES

2. Plaintiff Durand is a 51-year-old, black Haitian woman with a heavy Haitian accent. Ms. Durand resides in Kings County, New York.
3. Defendant Crown Heights Center for Nursing and Rehabilitation is a domestic corporation organized and existing under the laws of the State of New York. Upon information and belief, it maintains its principal place of business at 810 St. Marks Ave, Brooklyn, NY 11213.
4. Defendant Joel Landau (“Defendant Landau”) is an individual who serves as the CEO of Defendant Corporations nursing home, with a principal place of business located at 810 St. Marks Ave, Brooklyn, NY 11213.
5. At all relevant times hereto, Defendants collectively were Ms. Durand’s “employer” as that term is defined under the NYCHRL, NYSHRL, and NYLL.

NATURE OF ACTION

6. This is an action for monetary and declaratory relief to redress Defendants' violation of Plaintiff Durand's workplace rights. Plaintiff Durand seek relief for violations of Fair Labor Standards Act of 1938, 29 U.S.C. § 201 et seq. ("FLSA"), and for violations of the N.Y. Labor Law § § 190 et seq. and 650 et seq. (The "NYLL"), N.Y. Exec. Law § 290 et seq.
7. At all times relevant to this Complaint, Defendants maintained a policy and practice of requiring Plaintiff Durand, and other similarly situated employees, to work an excess of forty (40) hours per week without providing the overtime compensation required by federal and state laws and regulations.
8. Plaintiff Durand now bring this action on behalf of herself, and other similarly situated employees, for unpaid overtime wages pursuant to the Fair Labor Standards Act of 1938, 29 U.S.C. § 201 et seq. ("FLSA"), and for violations of the N.Y. Labor Law § § 190 et seq. and 650 et seq. (The "NYLL"), including applicable liquidated damages, interest, attorneys' fees and costs.
9. Plaintiff Durand seeks certification of this action as a collective action on behalf of herself individually, former employees, and all other similarly situated employees who elect to opt-in to this action pursuant to FLSA, 29 U.S.C. §§ 201 *et seq.*, and specifically, the collective action provision of 29 U.S.C. § 216(b).

JURISDICTION AND VENUE

10. Venue is properly set in the Eastern District of New York because Crown Heights Center for Nursing and Rehabilitation is located in this district where it regularly conducts business in Brooklyn, New York.
11. This Court has personal jurisdiction over Defendants pursuant to and consistent with the Constitutional requirements of Due Process in that Defendants, acting directly or through their agents or apparent agents, committed one or more of the following:
 - i. The transaction of any business within the state;
 - ii. The making of any contract within the state;
 - iii. The commission of a tortious act within this state; and

- iv. The ownership, use, or possession of any real estate situated within this state.
12. Requiring Defendants to litigate these claims in New York does not offend traditional notions of fair play and substantial justice. Plaintiff Durand's claims arise from conduct occurring at Crown Heights Center for Nursing and Rehabilitation by Defendants in Brooklyn, New York.

COLLECTIVE ACTION ALLEGATIONS

13. Plaintiff Durand brings the First Cause of Action, an FLSA claim, on behalf of herself and all similarly situated persons who work or have worked for Defendant Corporation who elect to opt-in to this action (the "FLSA Collective").
14. Defendants are liable under the FLSA for, inter alia, failing to properly compensate Plaintiff Durand and the FLSA Collective.
15. Consistent with Defendants' policies and patterns or practices, Plaintiff Durand and the FLSA Collective were not paid the proper premium overtime compensation of one and a half times their regular rates of pay for all hours worked beyond 40 hours per workweek.
16. All of the work Plaintiff Durand and the FLSA Collective have performed has been assigned by Defendant, and/or Defendant have been aware of all of the work that Plaintiff and the FLSA Collective have performed.
17. As part of their regular business practice Defendant has intentionally, willfully, and repeatedly engaged in a pattern, practice, and/or policy of violating the FLSA with respect to Plaintiff Durand and the FLSA Collective. This policy and pattern or practice includes, but is not limited to, willfully failing to pay their employees, including Plaintiff Durand and the FLSA Collective, proper premium overtime wages for all hours worked in excess of 40 hours per workweek.

CLASS ACTION ALLEGATIONS

18. Plaintiff Durand bring the NYLL claims, under Rule 23 of the Federal Rules of Civil Procedure, on behalf of herself and a class of persons consisting of:
- All persons who work or have worked as RN's for Defendant Corporation in New York State between 2015 and the date of final judgment in this matter (the "Rule 23 Class").

19. The Rule 23 Class Members are so numerous that joinder of all members is impracticable, and the disposition of their claims as a class will benefit the parties and the Court.
20. Plaintiff Durand claims are typical of those claims that could be alleged by any Rule 23 Class Member, and the relief sought is typical of the relief which would be sought by each Rule 23 Class Member in separate actions.
21. Plaintiff Durand and the Rule 23 Class Members have all been injured in that they have been uncompensated or under-compensated due to Defendants' common policies, practices, and patterns of conduct. Defendants' corporate-wide policies and practices affected all Rule 23 Class Members similarly, and Defendants benefited from the same type of unfair and/or wrongful acts as to each of the Rule 23 Class Members.
22. Plaintiff Durand is able to fairly and adequately protect the interests of the Rule 23 Class Members and has no interests antagonistic to the Rule 23 Class Members.
23. Plaintiff Durand is represented by an attorney who is experienced and competent.
24. A class action is superior to other available methods for the fair and efficient adjudication of the controversy – particularly in the context of wage and hour litigation where individual class members lack the financial resources to vigorously prosecute a lawsuit against corporate defendants. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently, and without the unnecessary duplication of efforts and expense that numerous individual actions engender.
25. Common questions of law and fact exist as to the Rule 23 Class that predominate over any questions only affecting Plaintiff and the Rule 23 Class Members individually and include, but are not limited to, the following:
 - a. Whether Defendants failed to compensate Plaintiff Durand and the Rule 23 Class for all hours worked at their regular rate(s) of pay;
 - b. Whether Defendants failed to compensate Plaintiff Durand and the Rule 23 Class for hours worked in excess of 40 per work week;
 - c. Whether Defendants failed to furnish Plaintiff Durand and the Rule 23 Class with accurate statements with every payment of wages, as required by the NYLL;
 - d. The nature and extent of class-wide injury and the measure of damages for those injuries.

FACTUAL ALLEGATIONS

Defendants Constitute Joint Employers

26. Defendant's operate a Nursing and Rehabilitation center located in New York City, in the borough of Brooklyn.
27. Defendant's act in the interest of itself with respect to employees, pay employees by the same method, and share control over the employees.
28. Defendant's possessed substantial control over Plaintiff Durand, and other similarly situated employees, working conditions, and over the policies and practices with respect to the employment and compensation of Plaintiff Durand and all similarly situated employees, referred to herein.
29. Defendant's employed Plaintiff Durand, and all similarly situated employees, and are Plaintiff Durand's, and other similarly situated employees, employers within the meaning of 29 U.S.C. 201 et seq. and the NYLL.
30. In the alternative, Defendant constitute a single employer of Plaintiff Durand and all similarly situated employees.
31. At all relevant times, Defendants were Plaintiff Durand's employer within the meaning of the FLSA and NYLL. Defendants had the power to hire and fire Plaintiff Durand, controlled the terms and conditions of her employment, and determined the rate and method of any compensation in exchange for Plaintiff Durand's services.

Individual Plaintiff

32. Plaintiff Durand is a former employee of Defendants who was employed as a Registered Nurse.
33. Plaintiff Durand seeks to represent a class of similarly situated individuals under 29 U.S.C. 216(b).

Plaintiff Durand

34. Plaintiff Durand is a wife and a proud mother of 2.
35. Plaintiff Durand was employed by the Defendants from approximately 2015 until August 19, 2017. Defendants employed Plaintiff Durand as a Registered Nurse.

36. Plaintiff Durand was praised consistently by her colleagues and her patients for being kind, courteous, and providing excellent service. So much so, she was often asked to work extended hours after her scheduled shifts.
37. Plaintiff Durand's work duties required neither discretion nor independent judgment. Throughout her employment with Defendants, Plaintiff Durand regularly worked in excess of forty (40) hours per week.
38. Plaintiff Durand has firsthand knowledge of Defendant Corporation's violating the U.S. Department of Labor's wage and hour laws.

Joel Landau Commits Overtime Theft

39. The Fair Labor Standards Act requires covered employers to pay employees at least the applicable federal minimum wage for all hours worked and overtime pay for hours worked over 40 hours in a workweek.
40. Registered Nurses are covered employers under Section 3(s)(1)(B) of the FLSA.
41. Hospitals and other institutions "primarily engaged in the care of the sick, the aged, or the mentally ill" are covered employers under Section 3(s)(1)(B) of the FLSA. Thus, hospitals, residential care establishments, skilled nursing facilities, nursing facilities, assisted living facilities, residential care facilities and intermediate care facilities for intellectually and developmentally disabled individuals must comply with the minimum wage, overtime of the FLSA.
42. According to the NYLL, an employer is required to pay overtime to employees, unless otherwise exempt, at the rate of 1½ times the employee's regular rate of pay for all hours worked over 40 hours in a workweek.
43. Upon information and belief, Plaintiff Durand is prepared to prove that Defendant Landau, as well as, Defendant Corporation's senior management stole hundreds of hours of overtime from her. The evidence will show that Ms. Durand Started work at 7am and would punch out at 7:45pm. This is an average of 12 to 13 hours a day.
44. Upon information and belief, in a 7-day work week Ms. Durand worked an average of 60 to 72 hours a week. These hours were not reflected on her paychecks.

Plaintiff Durand Estimated Hours Worked**Dates worked, estimated hours worked, rate of pay, estimated overtime owed:**

Date Worked	Hours Worked 7am-7pm	Overtime Owed (converted to minutes)	Rate of Pay: Time and a half
07/01/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/02/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/03/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/04/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/06/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/07/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/08/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/09/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/10/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/11/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/13/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/14/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/15/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/16/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/17/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/18/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/20/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/21/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/22/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
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07/27/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/28/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/29/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/30/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
07/31/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
08/01/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
08/03/2015	12 Hours	4 Hours	\$42.66 + 50%= \$63.99
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12/30/2015	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
12/31/2015	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
Total Owed 2015		632 Hours	\$40,441.68
01/01/2016	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
01/02/2016	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
01/04/2016	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
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12/30/2016	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
12/31/2016	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
Total Owed 2016		1,256 Hours	\$80,371.44
01/02/2017	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
01/03/2017	12 Hours	4 Hours	$\$42.66 + 50\% = \63.99
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Total Owed 2017		1,144 Hours	\$73,204.56

Estimated Unpaid Overtime Hours		3,032 Hours	\$194,071.68
9% Interest	\$17,461.59		
NYLL 100% Penalty	\$211,533.27		
FLSA 100% Penalty	\$211,533.27		
Estimated Total wages owed:			\$423,066.54

45. Upon information and belief, Plaintiff Durand is prepared to reveal how managers and supervisors would go into the Timecard System and change the punch in and punch out times of the Registered Nurses. This illegal act reduces the employees daily and weekly hours worked. Ms. Durand would then have to beg and plead with her supervisor and managers to pay her time. Unfortunately for Ms. Durand the payments never came.

FLSA Collective Action Claims

46. Plaintiff's bring this FLSA overtime compensation, and liquidated damages claims as a collective action pursuant to FLSA Section 16(b), 29 U.S.C. § 216(b), on behalf of all similarly situated employees (the "FLSA Class Members"), i.e., persons who are or were employed by Defendant's, on or after the date that is three years before the filing of the complaint in this case (the "FLSA Class Period").

47. Upon information and belief, at all relevant times, Plaintiff's and other members of the FLSA Class were similarly situated in that they had substantially similar job requirements and pay provisions, and have been subject to Defendants' common practices, policies, programs, procedures, protocols and plans including willfully failing and refusing to pay them the required overtime pay at a one and one-half their regular rates for work in excess of forty (40) hours per workweek under the FLSA, and willfully failing to keep records required by the FLSA.

48. The claims of Plaintiff's stated herein are similar to those of the other employees.

FIRST CAUSE OF ACTION

**FAIR LABOR STANDARDS ACT-OVERTIME WAGES
(Brought on behalf of Plaintiff Durand and the purported Rule 23 Class)**

49. Plaintiff Durand repeats and realleges all paragraphs above as though fully set forth herein.
50. The overtime wage provisions set forth in the FLSA, 29 U.S.C. §§ 201 *et seq.*, and the supporting federal regulations, apply to Defendants and protect Plaintiff's and the FLSA Class members.
51. Defendants, in violation of 29 U.S.C. § 207(a)(1), failed to pay Plaintiff's and the FLSA Class Members overtime compensation at a rate of one and one-half times the regular rate of pay for each hour worked in excess of forty hours in a work week.
52. Defendants' failure to pay Plaintiff's and the FLSA Class members, overtime compensation was willfully within the meaning of 29 U.S.C. § 255(a).
53. As a result of Defendants' willful violations of the FLSA, Plaintiff's and the FLSA class members have suffered damages by being denied overtime compensation in amounts to be determined at trial, and are entitled to recovery to such amounts, liquidated damages, prejudgment interest, attorneys' fees and costs, and other compensation pursuant to 29 U.S.C. §§ 201 *et seq.*

SECOND CAUSE OF ACTION

**VIOLATION OF THE OVERTIME PROVISIONS
OF THE NEW YORK STATE LABOR LAW
(Brought on behalf of Plaintiff Durand and the prospective Rule 23 Class)**

54. Plaintiff Durand and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.
55. Defendants, in violation of N.Y. Lab. Law § 190 *et seq.*, and supporting regulations of the New York State Department of Labor, failed to pay Plaintiff and all similarly situated employees, overtime compensation at rates of one and one-half times the regular rate of pay for each hour worked in excess of forty (40) hours in a work week.
56. Defendants' failure to pay Plaintiff and all similarly situated employees, overtime compensation was willful within the meaning of N.Y. Lab. Law § 663.

57. Plaintiff Durand and all similarly situated employees, are entitled to recover from Defendants their unpaid overtime wages, liquidated damages as provided for by the NYLL, reasonable attorneys' fees and costs, and pre-judgment and post-judgment interest.

THIRD CAUSE OF ACTION

VIOLATION OF THE TIMELY PAYMENT PROVISIONS OF THE NEW YORK LABOR LAW

(Brought on behalf of Plaintiff Durand and the prospective Rule 23 Class)

58. Plaintiff Durand and all similarly situated employees, repeats and realleges all paragraphs above as though set forth fully herein.

59. Defendants did not pay Plaintiff's, and all similarly situated employees, on a weekly basis in violation of NYLL § 191.

60. Defendants are liable to Plaintiff's and all similarly situated employees, in an amount to be determined at trial.

FOURTH CAUSE OF ACTION

VIOLATION OF THE NOTICE AND RECORDKEEPING REQUIREMENTS OF THE NEW YORK LABOR LAW

(Brought on behalf of Plaintiff Durand and the Rule 23 Class)

61. Plaintiff Durand and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.

62. Defendants failed to provide Plaintiff Durand and all similarly situated employees, with a written notice, in English and in French (Plaintiff's Durand's primary language), containing: the rate or rates of pay and basis thereof, whether paid by the hour, shift, day, week, salary, piece, commission, or other; allowances, if any, claimed as part of the minimum wage, including tip, meal, or lodging allowances; the regular pay day designated by the employer; the name of the employer; any "doing business as" names used by the employer; the physical address of the employer's main office or principal place of business, and a mailing address if different; and tighten telephone number of the employer, as required by NYLL § 195(1).

63. Plaintiff's and all similarly situated employees are damaged in an amount to be determined at trial.

FIFTH CAUSE OF ACTION

**VIOLATION OF THE WAGE STATEMENT PROVISIONS
OF THE NEW YORK LABOR LAW**

(Brought on behalf of Plaintiff Durand and the Rule 23 Class)

64. Plaintiff Durand and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.
65. With each payment of wages, Defendants failed to provide Plaintiff Durand and all similarly situated individuals, with an accurate statement listing each of the following: the dates of work covered by that payment of wages; name of employee; name of employer; address and phone number of employer; rate or rates of pay as basis thereof, whether paid by the hour, shift, day, week, salary, piece, commission, or other; gross wages; deductions; allowances, if any, claimed as part of the minimum wage; net wages; the regular hourly rate or rates of pay; the overtime rate or rates of pay; the number of regular hours worked; and the number of overtime hours worked, as required by NYLL § 195(3).
66. Due to Defendants' violation of NYLL, Article 6, § 195(3), Plaintiff Durand and all similarly situated employees, are entitled to statutory penalties of two hundred fifty dollars for each workweek that Defendants failed to provide them with accurate wage statements, or a total of five thousand dollars, and reasonable attorneys' fees and costs as provided for by NYLL, Article 6, § 198(1-d).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Durand respectfully requests that this Court enter judgment against Defendants by:

- a) Designating this action as a collective action and authorizing prompt issuance of notice pursuant to 29 U.S.C. § 216(b) to all putative class members apprising them of the pendency of this action, and permitting them to promptly file consents to be Plaintiffs in the FLSA claims in this action;
- b) Declaring that Defendants violated the minimum wage provisions of, and associated rules and regulations under, the FLSA as to Plaintiff's and the FLSA Class members;
- c) Declaring that Defendants violated the overtime wage provisions of, and associated rules and regulations under, the FLSA as to Plaintiff's and the FLSA Class members;

- d) Declaring that Defendants violated the record keeping requirements of, and associated rules and regulations under, the FLSA with respect to Plaintiff's and the FLSA Class members' compensation, hours, wages, and any deductions or credits taken against wages;
- e) Declaring that Defendants' violations of the provisions of the FLSA were willful as to Plaintiff's and the FLSA Class members;
- f) Awarding Plaintiff's and the FLSA Class Members damages for the amount of unpaid minimum wages, overtime compensation, and damages for any improper deductions or credits taken against wages under the FLSA as applicable;
- g) Awarding Plaintiff's and the FLSA Class members liquidated damages in an amount equal to 100% of their damages for the amount of unpaid minimum wage and overtime compensation, and damages for any improper deductions or credits taken against wages under the FLSA as applicable pursuant to 29 U.S.C. § 216(b);
- h) Declaring that Defendants violated the overtime wage provisions of, and rules and orders promulgated under, the NYLL as to Plaintiff's and all similarly situated employees;
- i) Declaring that Defendants violated the timely payment provisions of, and rules and orders promulgated under, the NYLL as to Plaintiff's and all similarly situated employees;
- j) Declaring that Defendants violated the notice and record keeping requirements of the NYLL with respect to Plaintiff's and all similarly situated employee's compensation, hours, wages and any deductions of credits taken against wages;
- k) Awarding Plaintiff's and all similarly situated employees' damages for the amount of unpaid minimum wage and overtime compensation, and for any improper deductions or credits taken against wages, as well as awarding spread hours pay under the NYLL as applicable;
- l) Awarding Plaintiff's and all similarly situated employees' damages for Defendants' violation of the NYLL notice and recordkeeping provisions, pursuant to NYLL §§ 198(1-b), 198(1-d);
- m) Awarding Plaintiff's liquidated damages in an amount equal to one hundred percent (100%) of the total amount of minimum wage, overtime compensation, and spread of hours pay shown to be owed pursuant to NYLL § 663 as applicable; and liquidated damages pursuant to NYLL § 198(3);

- n) Awarding Plaintiff's and the FLSA Class members pre-judgment and post-judgment interest as applicable;
- o) Awarding Plaintiff's and the FLSA Class members the expenses incurred in this action, including costs and attorneys' fees;
- p) Providing that if any amounts remain unpaid upon the expiration of ninety (90) days following issuance of judgment, or ninety (90) days after expiration of the time to appeal and no appeal is then pending, whichever is later, the total amount of judgment shall automatically increase by fifteen (15%) percent, as required by NYLL § 198(4); and
- q) All such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff 's and all similarly situated employees, demand a trial by jury on all issues triable by a jury.

Dated: New York, New York
October 6, 2020

By: Tyrone A. Blackburn, Esq.

/s/ Tyrone Blackburn
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